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Via ECF

Honorable Nancy Hershey Lord
U.S. Bankruptcy Court, EDNY
Conrad B. Duberstein Courthouse
271-C Cadman Plaza East - Suite 1595
Brooklyn, NY 11201-1800

RE: Northfield 30 Corp.
Rule 11 Motion

Dear Hon. Judge Lord:

We are counsel for Creditor JDP Mortgage, LLC (“JDP”). On February 20, 2019, JDP’s counsel, Hasbani & Light, P.C., served a copy of the Motion for Rule 11 Sanctions (the “Motion”) upon Ilan David Avitsedek at his home address. This Court adjourned the Motion to March 12, 2019 at 3:30pm.

Pursuant to the Eastern District of New York’s Local Bankruptcy Rule 9006-1 entitled “Time for Service and Filing of Motions and Answering Papers,” an opposition “shall be served so as to be received not later than 7 days before the hearing date.” *See* Rule 9006-1(ii). Once an opposition is filed, the movant has to submit its reply 3 days before the hearing date. *See* Rule 9006-1(iii). Rule 9006-1 also states that “[a]ny party filing papers with the Court within 3 days prior to a hearing date shall contact chambers to advise that such papers have been filed.” *See* Rule 9006-1.

Here, Debtor, Northfield 30 Corp. (“Debtor”) filed its opposition on ECF on March 7, 2019. Since the hearing on the Motion is scheduled for March 12, 2019, the opposition was filed in violation of Rule 9006-1(ii) since it was filed less than 7 days before the hearing date.

As a result of the foregoing, this Court should disregard the opposition and grant JDP’s Motion.¹ In the alternative, we respectfully request an adjournment of the March 12, 2019 hearing on the Motion so that JDP can submit a reply to Debtor’s opposition. Many of Debtor’s arguments in opposition are inflammatory and false.

¹ The Court should note that the Debtor’s opposition completely ignores the Court’s motion for sanctions against the Debtor for its contempt of the Court’s prior orders.

We thank the Court for its time and consideration of this matter.

Sincerely,

/s/Danielle P. Light

Danielle P. Light, Esq.

Counsel for Creditor JDP Mortgage, LLC